

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	
JORGE LUIS LARA MENDOZA	:	1:20CR128-1
MIGUEL ANGEL PAREDES-CRUZ	:	1:20CR128-2
SARA MARITZA ANDRADE LEDEZMA	:	1:20CR128-3

FACTUAL BASIS FOR A GUILTY PLEA

NOW COMES the United States of America, by and through Matthew G.T. Martin, United States Attorney for the Middle District of North Carolina, and states that the factual basis for a guilty plea is as follows:

In or around October 2019, the Orange County Sheriff's Office ("OCSO") Narcotics Investigation Division received information from a confidential and reliable source (hereinafter referred to as "CS") regarding drug distribution in and around Burlington, North Carolina. Investigators identified the potential targets of the investigation as defendants SARA MARITZA ANDRADE LEDEZMA and her boyfriend, MIGUEL ANGEL PAREDES-CRUZ.

On October 3, 2019, OCSO investigators, assisted by the Drug Enforcement Administration ("DEA") Raleigh Heroin Enforcement Group, conducted a surveillance operation and covered the controlled buy between the CS and ANDRADE LEDEZMA, in which the CS purchased an eight ball

(approximately 3.5 grams) of suspected cocaine for \$160 from ANDRADE LEDEZMA.¹ The transaction occurred in the parking lot of the Walmart located at 530 S. Graham Hopedale Road in Burlington, North Carolina. ANDRADE LEDEZMA arrived at the buy location driving a dark Dodge Charger, bearing California license plate number 6YYJ412.

During the controlled buy, the CS and ANDRADE LEDEZMA discussed the purchase of multi-kilogram quantities of cocaine. ANDRADE LEDEZMA advised the CS that she had one kilogram ready to sell for \$35,000. ANDRADE LEDEZMA also advised the CS that she would let him/her know when she had a larger quantity of cocaine to sell to the CS.

On October 26, 2019, ANDRADE LEDEZMA contacted the CS and advised that she had three kilograms of cocaine ready to sell to the CS, but that the buy needed to happen the same day. ANDRADE LEDEZMA and the CS agreed to meet at the Petro gas station located at 500 Buckhorn Road in Mebane, North Carolina at approximately 5 p.m.

Before the controlled buy, investigators met with the CS at a predetermined meeting location. Investigators searched the CS and his/her

¹ The suspected cocaine recovered from the CS was later weighed and field tested. The substance weighed approximately 3.8 grams and tested positive for cocaine.

vehicle for contraband and found none. The CS was also equipped with an audio recording device.

Investigators subsequently observed the Dodge Charger, bearing California license plate number 6YYJ412, arrive at the Petro gas station. After parking near the CS's car, ANDRADE LEDEZMA got out of the Dodge Charger and into the CS's vehicle. ANDRADE LEDEZMA told the CS that she had the product in a bag in the Dodge Charger. She also advised that she was with her "husband" (later identified as PAREDES-CRUZ) and two other men.

ANDRADE LEDEZMA and the CS walked over to the Dodge Charger. ANDRADE LEDEZMA got into the Dodge Charger through the front passenger door; the CS entered through the rear passenger door and made contact with a Hispanic man to his/her immediate left (later identified as defendant JORGE LUIS LARA MENDOZA) and a white man sitting behind the driver's seat (later identified as Jamie Lee Mays). ANDRADE LEDEZMA's "husband" (PAREDES-CRUZ) was in the driver's seat.

The CS asked to see the cocaine and ANDRADE LEDEZMA pulled out a kilogram from a bag near her feet. LARA MENDOZA advised the CS that they do not open the product but that it was guaranteed. LARA MENDOZA further advised if there was anything wrong with the product they would

refund the money or exchange it. The CS advised them that he/she could go pick up the money or they could follow the CS to the courier's location. LARA MENDOZA replied that they would follow the CS.

The CS got back in his/her car and left the buy location. The Dodge Charger followed the CS's car, getting on I-85 traveling northbound. OCSO Deputy Aaron Popp observed the Dodge Charger change lanes several times as he approached the Dodge Charger in his patrol car. The Dodge Charger then picked up speed, traveling 75 mph in a 65 mph zone. Deputy Popp then initiated a traffic stop of the Dodge Charger near exit 165 on I-85 for speeding. Officer Scott Foster with the Hillsborough Police Department ("HPD") arrived on the scene with his K-9 immediately thereafter to assist with the stop.

Upon approaching the Dodge Charger, Deputy Popp noticed that there were four people in the car. The driver was identified as Jamie Lee Mays and the front passenger as ANDRADE LEDEZMA. When asked, Mays advised that he did not have a driver's license or identification. Mays appeared nervous; his right hand and knee were visibly shaking. Officer Foster could also see the driver's side passenger's leg shaking very hard (PAREDES-CRUZ), consistent with extreme nervousness. Deputy Popp asked if they were coming from California. Mays said he was from Graham, North Carolina and that they were heading to Raleigh. When asked if they were going to the North

Carolina State Fair, Mays and LARA MENDOZA gave conflicting answers.

Upon returning to his patrol car, Deputy Popp ran Mays' information and learned that he was on active probation in Alamance County for possession with intent to sell controlled substances. Deputy Popp approached the Dodge Charger and Mays confirmed that he was on probation for narcotics. When asked if there were any narcotics in the car, Mays said no. Deputy Popp then asked for consent to search the car. Mays responded that it was his brother's car. He subsequently told Officer Foster that the car belonged to his brother's sister. Mays and the passengers continued to provide conflicting information to law enforcement, including with respect to the owner of the car.

Due to the fact that the occupants were acting suspiciously, giving conflicting answers, and exhibiting nervous behavior, law enforcement decided to deploy a K-9 to perform an open air sniff around the car. The passengers were asked to step out of the car and were frisked for weapons. Officer Foster subsequently ran his K-9 around the vehicle to perform an open air sniff and the K-9 alerted on the vehicle.

Law enforcement subsequently searched the Dodge Charger and found approximately three kilograms of suspected cocaine wrapped in black duct tape located in a paper bag on the floorboard of the front passenger seat where ANDRADE LEDEZMA had been sitting. Law enforcement also found a

Smith & Wesson SD9 9mm handgun, bearing serial number FBM4191, in the seat back pocket of the front passenger seat. The gun, which was located in front of where LARA MENDOZA had been sitting, was loaded with fifteen rounds of ammunition and concealed in a baby's diaper.

The suspected cocaine recovered from the Dodge Charger was later weighed and field tested. The substance weighed approximately 3.415 kilograms and tested positive for cocaine. The narcotics were subsequently submitted to the DEA Mid-Atlantic lab for further testing; those results are still pending.

LARA MENDOZA, PAREDES-CRUZ, and Mays each waived his *Miranda* rights and agreed to be interviewed by law enforcement.² During the post-*Miranda* interview, LARA MENDOZA denied knowing about the approximately three kilograms of suspected cocaine found in the car; however, he admitted that the gun belonged to him. LARA MENDOZA advised law enforcement that he always carried a gun with him. LARA MENDOZA also told law enforcement that PAREDES-CRUZ asked him to bring the gun because "you never know when you might need [it]."

PAREDES-CRUZ stated that they were on their way to the Raleigh area

² ANDRADE LEDEZMA declined to be interviewed.

when they were stopped by police. According to PAREDES-CRUZ, when they stopped for gas, an unknown person approached the Dodge charger, put a black bag in the car, and told them to follow him/her. PAREDES-CRUZ told law enforcement that he did not know what was in the bag, but that they followed the person onto the highway. PAREDES-CRUZ denied any knowledge of the three kilograms of suspected cocaine or the firearm located in the car.

Mays told law enforcement that he was driving all three passengers to Raleigh when they were stopped by police. Mays later revised his statement and told law enforcement that after they were pulled over, PAREDES-CRUZ told Mays to swap seats with him. According to Mays, an unknown Hispanic person met up with them at the gas station and spoke to the other passengers in Spanish. Mays denied understanding Spanish. When asked, Mays denied any knowledge of the suspected three kilograms of cocaine recovered from the floor board of the front passenger seat or the gun located in the back pocket of the passenger seat.

This the 2nd day of July, 2020.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

John A. Duberstein, Esq.

Alan Doorasamy, Sr., Esq.

James Edward Quander, Esq.

/S/ MEREDITH C. RUGGLES
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